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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

WESTERN ENERGY ALLIANCE and) PETROLEUM ASSOCIATION OF) WYOMING,) Petitioners,) v.) JOSEPH R. BIDEN, Jr., in his official) capacity as President of the United States,) DEB HAALAND, in her official) capacity as Secretary of the Interior,) and UNITED STATES BUREAU) OF LAND MANAGEMENT,) Respondents.) _____)	Civil Case No. 0:21-cv-00013-SWS
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SECOND AMENDED PETITION FOR REVIEW OF GOVERNMENT ACTION

Petitioners Western Energy Alliance and the Petroleum Association of Wyoming submit respectfully this petition for review of government action under Local Civil Rule 83.6. On January 27, 2021, the President of the United States directed the Secretary of the Interior to suspend indefinitely the federal oil and gas leasing program. On or about February 12, 2021, the

Secretary added notations on the Bureau of Land Management's website indicating that all onshore oil and gas lease sales scheduled for March or April 2021 have been postponed. The suspension of the leasing program is an unsupported and unnecessary action that is inconsistent with the Secretary's statutory obligations. Because the suspension is both arbitrary and capricious and contrary to law, the Court should find the suspension invalid and set aside the challenged government action.

This Court has federal-question jurisdiction under 28 U.S.C. § 1331. Respondent President Biden is an officer of the United States; Respondent Haaland is an officer of the United States; the Bureau of Land Management is an entity of the United States Government. The United States has waived its sovereign immunity under the APA, 5 U.S.C. § 702.

Submitted respectfully this 17th day of March, 2021,

/s/ L. Poe Leggette

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CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2021, a copy of the foregoing **SECOND AMENDED PETITION FOR REVIEW OF GOVERNMENT ACTION** was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

A true and correct copy was also served by electronic mail on the following party:

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/s/ L. Poe Leggette

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